5-7-85

DECLARATION OF GERALD ARMSTRONG

I, GERALD ARMSTRONG, declare:

(1) In the case of Julie Christofferson-Titchbourne v. Church of Scientology of California, et al., Multnomah County, Oregon, Circuit Court No. 7704-05184, currently being tried in Portland, Oregon, defendant organization was ordered to produce my B-1 files. B-1 is Bureau One, the Intelligence Bureau of the Guardian's Office.

(2) Although the names B-1 and Guardian's Office have been changed, the same intelligence functions are still performed by Scientology connected organizations. I was present in court during the Christofferson trial, when Howard Gutfeld, a Scientology representative, testified that B-1, intelligence files and private investigator reports are now maintained in the Office of Special Affairs, a branch of Scientology.

(3) Defendant organization in Christofferson produced approximately five inches of materials from my B-1 files. Many of the intelligence reports or operations programs referenced in the B-1 materials produced, have been deleted by defendant organization. Nevertheless, the materials which were produced are completely relevant in the instant case. The materials produced are all internal Scientology correspondence or programs, and there is no correspondence to or from attorneys.

EXHIBIT H.

(4) There are numerous references to my preclear (pc) files in the produced B-1 materials, and there are entries in the B-1 time track, the chronology that forms part of the B-1 materials, which show unequivocally that Scientology intelligence personnel had my pc files after I left the organization, and excerpted data for intelligence use. One such entry uses the words "in session" as source of an account of a sexual encounter I had with a woman. "In session" means that the information came from the auditor's reports in an "auditing session."

(5) My pc folders were used as well in the operation by Scientology/Hubbard against me which resulted in the illegal videotaping of me in a series of conversations with individuals who represented to me that they sought to reform the organization and correct its abuses. There are statements on the videotapes which substantiate the fact that my pc folders were used as a lure to entrap me.

(6) Just after the trial in the defense part of the instant case and just prior to my going to London, England to testify in a child custody case, I received a call from someone whom I later confirmed was "Joey," the intelligence operative videotaped along with me in the November 7 and 9, 1984 meetings. In the telephone call, Joey said that my pc folders were being moved and I would be able to get them if I wanted. He said that my folders would be in a certain place the next night where I would be able to pick them up.

I asked him if it could be at all construed that I would be accepting stolen property and he said he didn't know. For that reason and because I was leaving for London, I declined Joey's offer. This phone call is discussed in the November 7, 1984 videotape.

(7) In another November, 1984 meeting with Mike Rinder, another Scientology operative, which meeting was also surreptitiously videotaped, my pc folders were also discussed. Rinder stated that (following the Armstrong trial) my folders were moved from Clearwater. This was probably a lie, since the whole operation against me was based on lies by the organization, but it did show Rinder's knowledge of the use of my pc folders in the operation.

(8) The idea to use my pc folders to entrap me arose from a "debrief" by my former wife, Terri Gamboa, of a meeting we had in March, 1984 just prior to the Armstrong trial. This "debrief," attached hereto as Attachment A, was recently produced by Scientology as part of my B-1 files and was admitted into evidence in the Christofferson trial. The "briefing" and all other programs and documentation which arose from this "debrief," have not been produced.

(9) Regarding my pc folders, Mrs. Gamboa states in Attachment A, page 4, paragraphs 6 and 7:

> "An important point for him was getting his pc folders back as he feels that that's the solution

to his future sanity. He brought this up several times.

A line has been established with him and possibly this can be built up from here and used again in the future. He is desperate and he has no way out at this point."

Terri Gamboa was then working for Author Services, Inc., yet the "debrief" was in Scientology intelligence files.

(10) There is no doubt that Scientology/Hubbard or their connected corporations have used my pc folders, and used the information and the folders themselves to entrap, intimidate and destroy me. The folders and contents are mine and these organizations do not have the remotest right to them.

Sworn under the pains and penalties of perjury this 7th day of May, 1985.

Executed at Portland, Oregon.

Gerald Armstrong

GERALD ARMSTRONG

Cynthia Chandler

Notary Public for Oregon
My Commission expires: 5/11/87

12 March 1984

DEBRIEF - GERRY ARMSTRONG MEETING - 8 MARCH 84

I met with Gerry Armstrong on Thursday, 8 March 84 to see if I could do any kind of a handling on him to get him to knock off the war and back out of the suit or anything in this direction.

I phoned him on Tuesday the 6th and told him that I would like to meet with him as a friend to see if I could help him in any way. He was agreeable to a meeting, I asked if he was going to bring his wife and he said he would see if she wanted to come and if she did then she would come, otherwise she wouldn't. (He was in Apathy/Boredom)

On Thursday I met with him at 10:00 in the morning up at the Griffith Park Observatory. I arrived 20 minutes late. They drove up behind me, but I found out they had waited 20 minutes and given up, they left but saw me coming up the hill so turned around and came back. So they definitely wanted the meeting. His wife did come so I asked if she could wait for us as I wanted to speak to him alone. They agreed to this.

From the point that he had gotten out of the car, he looked very hostile with a very stern face. His eyes and face looked very insane.

He came over to me and we walked away to talk and I just opened up with regular small talk but the first thing he did was stick his notebook in my face and written on it was "You said that you could help me, so how can you help me?"

Anytime I tried to say something to him, he would just put the notebook in front of me without saying a word, in other words, he didn't want to give me any information or get into anything other than hear what I had to say and how I could help.

I told him that I just wanted to see him uninvolved from all this, I didn't think he needed to keep carrying on this war and that he could end it just by getting out of the suit before it got worse for him and before he ended up owing even more money.

He started to rant and rave to me about how Scientology and LRH had lost him 15 years of his life because it had done him in and jerked him around and screwed him over and so on and so on, ranting and raving insanely. He definitely wanted to get

out of the suit but has a $100 to $150,000 debt to his attorneys which he absolutely must pay as they are his "friends" and he "owes them his life for saving him from all this".

I pointed out that he stole the documents and started this whole thing himself, all he had to do was give back the documents and he could end the whole thing. He disagreed of course that he had stolen the documents and said that those documents are vital to proving that he's been screwed around and jerked around with for years. He wants his pc folders very much so that he can regain his sanity by "sorting out what Scientology did to him and unravel it". He kept hinting at wanting some sort of an offer from the Church to help him pay off the attorneys as he is not willing to step out of this and be left economically busted for the rest of his life, as he puts it. I pointed out that there is no way that the Church is going to pay any of his attorney bills as he stole the documents and started the whole thing - the best he can do is to get out before it's worse.

I told him about the recent win in the LA case where the judge ruled that Scientology is a religion etc., etc.... He mentioned that he didn't know about this, but so what type of a response.

He would consistently rant and rave about how Scientology is screwing the world and it's worse than the government and this and that. He would flip into about 100 different valences all at once. He said that he still thinks I'm over the litigation and who am I going to go back and report to and did I get what I came for and here I am just jerking him around like all the others. He saw Marty already and he got jerked around by Marty and now he's getting jerked around by me.

I told him he was jerking me around as I came as a friend to talk to him and he wasn't even willing to talk he just ranted and raved about things that I don't even want to hear, and he might think and believe those things on Scientology and LRH and that's fine but there's millions of other people who don't and I don't and I didn't come here to listen to him carry on about this bullshit. At this point he would knock it off as he could see that I was willing to end the meeting if he did continue. Then we would start having a somewhat sane discussion for a few minutes before the ranting and raving started up again. He compulsively had to rant and rave about Scientology and LRH.

Then he started telling me about his little bird that he has at home and how it speaks 100 different words and it's the sanest part of his life. And then in the middle of this decent conversation, he blurts out "And don't you send one of your people around to kill him!".

He is constantly on the alert and look out for snipers in the bush that we have planted to kill him. While we were

up at Griffith Park he would constantly look around, in the bushes and check everywhere in case I had set him up. Somebody burst a balloon up there and he almost had a heart attack thinking someone had fired a shot at him.

He said that Scientology has operations out on him trying to kill him and someone (one of us) tried to run him off the freeway and so on. Then he said that he would rather be dead than fighting this way and maybe we would do him the favor of killing him because then it would be all over and he wouldn't have to worry about it anymore and he'd be dead. He said how he can't have any friends because he's afraid of getting close to anybody in case they're a spy for Scientology or whatever. He brought up the SP declare and all the things that are stated in it and how they were not true and they're very out of hand. He again mentioned his pc folders and asked me if I could pass on a message that he wanted his pc folders back. He then asked me to take a message back - "Here I'll give you something to take back to them...If I delivered all the documents to the Church, would they agree they could never be made public under any circumstances, or barring that, under what circumstances would they be made public?" He said "Ask them that, I'd like to know that."

I then asked him why he wanted to know the above as the way he said it was very different from the way he had just been carrying on - it was like a change in his insane ravings and it didn't fit in with his other statements, so I asked him why did he want to know this.

He didn't answer me for awhile (he was sort of daydreaming) and then finally said he didn't know and didn't care and he didn't really want the answer to the question anyway, he just threw it out there and it wasn't really him asking the question anyway. He didn't ask the question, he didn't want to know, it was just during one of his moments of insanity. He said that this whole case and procedure is driving him insane.

I told him I was sorry I couldn't be of more help, but if in the future there was some way I could help him, he could give me a call, he had my phone number already, so I left the line open for the future. I recommended to him that he take a vacation to get away from it all and just let himself destimulate. He said he can't because he's got a trial coming up on the 22nd of March. We started walking back towards the cars and as I walked towards my car, he said "where are you going?", I said "I'm going to my car", he said "Well, uh..." (obviously stalling and wanting to still continue the conversation but not really knowing what to say), he then said "Well don't you want to talk to Jocelyn?" (his wife). I said if you want me to I will. He said "Well I think she might want to talk to you or I think it would be good if you talk to her." We went over to where his wife was standing.

As soon as we got there he switched again to a totally different valence and in a very 1.1 type comment he said "So did you get what you came here for? Are you satisfied? Did you get the data you wanted?" She caught on that something was strange and said "Are you finished talking or do you want me to leave while you continue your discussions?" He said "No, that's fine, we're done." Then he said to me again, "Well did you feel you accomplished much?" And I said, "Well, I'd have to ask you, because I came here to help you, so if you don't feel I was any help, then obviously not." That shut him up and he stopped attacking me. He asked his wife if she wanted to speak to me and she said "I have nothing to say", so I didn't speak with her. I just gave her a friendly smile and indicated we could talk if she wanted to. She didn't. We walked towards the cars and he asked me if my last name was still Gamboa and I said it was. And then we bid each other good-bye and drove away.

SUMMARY

To sum it up, he was pretty nutso and very hard to communicate with as he would be in the middle of a ranting and raving insanity and I'd find that I would have to constantly try and communicate through this. I'd get him to knock it off for a second so that I could actually communicate to him and this would actually work, but then within the next couple of minutes he'd be back into it again so it wouldn't last long.

I did at least establish a comm line with him and I think it is something that I can build on in the future if we want to. He is willing to meet with me and talk with me, however, he trusts no one. He lives in a world of total fear and paranoia of everything and everybody.

It is obvious to me and clear by his statements and actions that he definitely wants out of this suit and he definitely wants help. But he needs the money to pay off his attorneys and that's what he's after - he's hoping that the Church will give him an offer. He has no other way out in his eyes and no way does he want to drop out of this with a debt that will last him for the rest of his life.

He is very desperate for a way out and I feel he would be willing to talk to anybody who might have anything to suggest, only because he'd be hoping that they're going to offer him something that will actually help.

An important point for him was getting his pc folders back as he feels that that's the solution to his future sanity. He brought this up several times.

A line has been established with him and possibly this can be built up from here and used again in the future. He is

desperate and he has no way out at this point.

Terri Gamboa